

Automated Commercial Environment—Requirements Recommendation

Date:	October 1, 2001
Number:	ACT-003 Maintaining Account Data (Augmented Version)
Requestor:	Account Management Subcommittee
Customs Co-Chair:	(signature)
Trade Co-Chair:	(signature)

Requirement: Maintaining Account Data

a. Data Maintenance. The Trade must have the capability to maintain all account data created/submitted by their users. This includes the ability to submit and change (update) administrative information (address, point of contact, license, bond, etc.) and to submit and change/correct transactional data (including post-summary data), subject to Customs requirements for the entry process.

b. Immediate Effect. Maintenance must be “immediate, real-time”. This means that the Trade must be able to electronically access and update on a demand basis any information that was previously submitted/updated and the updates must take immediate effect, i.e., the updated information be immediately available for Customs/ACE processing.

c. Maintaining Account Links. The account owner must have the capability to maintain (create, update, delete) links to other accounts in order to maintain account relationships across the corporate structure, as described in Requirement Recommendation ACT-001. (It is the responsibility of the Trade to determine and identify ownership across corporately linked accounts.)

d. Granting Privileges. The privilege to maintain account data is always available to the account-owner, who can grant access, maintenance, or ownership privileges to other individual users. This delegation capability is restricted to an account owner and shall take immediate effect. Granting privileges to others is accomplished via the account establishment process and/or account maintenance. A privilege thus granted is limited to the specific account's information and does not automatically extend to information associated with linked accounts. Scope can also be restricted to transactional data that's relevant to a particular business category (e.g., arrival and manifest data for carriers) or restricted to only administrative information.

e. Agent Authorization. In addition to granting maintenance privileges to specific users, an account owner can authorize another (agent) account to submit (and subsequently correct/update) various transaction filings on behalf of the client account. Such filings (submissions/corrections/updates) will be electronically associated with the client account as part of its transaction information, and also associated with the agent account as the submitter/filer. This authorization permits the agent account-owner to perform transaction maintenance, i.e., generate and submit transactional information concerning the Client's importation activities (subject to the limitations and constraints shown below) and access/update the submitted information.

- Agent Limitations. Establishing this agent authorization includes identifying the agent account and specifying the types of filings allowed, such as import declaration (entry/summary), protest, reconciliation, drawback request/claim, manifest, in-bond request, etc. The client account owner may also specify any limitations on the transactions, such as the effective time period, only importations at certain ports/regions or from specific countries, etc. A convenient user interface mechanism such as check-boxes is required for specifying such limitations and constraints.
- Secondary Delegation. The Agent account-owner may grant to other individual users the

privilege to maintain the transactions for this specific client account. The Client account, however, may limit such secondary delegation, e.g., to only employees of the Agent. Conversely, the Client may permit the (primary) Agent to authorize other (secondary) agent accounts to maintain transactions on behalf of this Client. The Client may cancel any such secondary agent authorizations.

- Canceling Authorization. The capability for establishing, modifying and canceling (deleting) the (primary) agent authorization is reserved exclusively to the client account-owner and shall take immediate effect. Canceling the agent authorization immediately cancels all Agent privileges, including those granted to other users by the Agent, for maintaining client transaction data. Access to historical transactions remains in effect, but only for the transactional data that has been maintained by the Agent account.

f. Privilege Verification. ACE must validate transactions (including changes/updates) to ensure submission by only an authorized user. ACE must thus prohibit access or maintenance of account information/transactions by any Trade user except for the account-owner and other users that have been specifically granted maintenance privilege per d. or e. above. For unauthorized submission, the account owner (or delegate) must be immediately notified and the transaction information must be suspended or rejected unless/until the account-owner/delegate responds with an acceptance and/or an authorization.

NOTE: It is understood that further details and specificity of this and related requirements must be defined in order to implement a satisfactory solution. The Account Management Subcommittee needs to remain involved during this requirement specification process and expects to provide feedback as refinements emerge. That is, requirements engineering necessarily involves Subject Matter Experts (SMEs), and this Subcommittee is the most relevant and available source of SMEs for account-related matters.

Business Need

- Account data provided to Customs by the Trade needs to be maintained in a timely, efficient fashion. The current process of submitting transaction changes/corrections to Customs, who then re-keys the updates, causes delay and can be a source of error, resulting in inaccurate or out-dated information. In addition, informing Customs about changes to administrative data (point of contact, address, phone, etc.) is not a rigorous process and often results in Customs having obsolete information. The Trade therefore needs to be able to update their own administrative and transaction data to ensure that ACE always has the most accurate and up-to-date information.
- The Trade needs to grant and cancel transaction privileges in an efficient and timely manner. On some occasions, the Trade has belatedly discovered that Customs accepted a filing from an agent that is no longer authorized by the client.

Technical Need

Unauthorized users must be prevented from submitting/changing account information. ACE implementation must therefore include careful definition of user roles, and management and enforcement of associated data maintenance privileges. In particular, the account owner role defines a user who can maintain all account information including links to other accounts, and who can grant access, maintenance, and ownership privileges to other users and to agent accounts.

Benefits

- a. The Trade can better ensure that Customs has correct and timely account information, including transactional data.
- b. Direct, electronic correction to data is more efficient for the Trade than generating and submitting paper-based change/correction forms
- c. By not having to process change/correction forms, Customs will have reduced data entry burden. This allows the Trade to fulfill the requirements of the Modernization Act, assuming the cost and taking full responsibility for the accuracy of the information.
- d. Electronic validation of authorized transactions, including limitations and constraints, will benefit Customs and the Trade through reduction of erroneous or invalid transactions.
- e. The Trade will be able to ensure the integrity of their agent authorizations, assuming the cost and taking full responsibility for the submissions by their Agents.

Risks

- a. Inadvertently granting maintenance privilege to the wrong users.
- b. Security failure causing unauthorized changes to account information.

Related Subcommittees

Trade Interface, Entry, Manifest

Priority: **Critical** ☒ **High** ☐ **Medium** ☐ **Low** ☐

Customs Use Only

Approved ☐ Not Approved ☐ Further Evaluation Required ☐